

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION**

**ALVA JOHNSON,**  
*Individually and On Behalf of All Others*  
*Similarly Situated*

**Case No.: 8:19-cv-475-T-02SPF**

**Plaintiff,**

**vs.**

**DONALD J. TRUMP**  
*In his Individual Capacity and*  
**DONALD J. TRUMP FOR PRESIDENT,**  
**INC.,**

**Defendant,**

\_\_\_\_\_ /

**MOTION FOR PERMISSION FOR**  
**HASSAN A. ZAVAREEI TO APPEAR *PRO HAC VICE***

Janet R. Varnell of the law firm of Varnell & Warwick, P.A., as counsel for Plaintiff, Alva Johnson, on behalf of herself and all others similarly situated (“Plaintiff”), hereby respectfully requests that this Court enter an Order permitting HASSAN A. ZAVAREEI to appear *pro hac vice* as co-counsel for Plaintiff in this action. In support of this Motion, the undersigned states as follows:

1. This application is made pursuant to Local Rule 2.02 of this Court.
2. Mr. Zavareei is not a Florida resident, practices from his office in Washington D.C. where he is a member in good standing of the District of Columbia Bar as well as the U.S. District Court for the District of Columbia.
3. Mr. Zavareei is an attorney and of counsel to the law firm of Tycko & Zavareei, LLP, with offices at 1828 L Street, NW – Suite 1000, Washington, DC 20036.

4. Mr. Zavareei is familiar with the Rules of this Court, including Rule 2.04, and is familiar with, and will be governed by, the Code of Professional Responsibility and other ethical limitations or requirements governing the professional behavior of members of the Florida bar.

5. Mr. Zavareei has not been the subject of disciplinary action in the last five years by any bar or courts of any jurisdiction in which he has been licensed and has never been denied admission to the courts of any state or federal court during the last five years.

6. The privilege afforded by Local Rule 2.02 has not been utilized by Mr. Zavareei to such a degree as to constitute the maintenance of a regular practice of law in the State of Florida.

7. In accordance with the local rules of this Court, Mr. Zavareei's Special Admission Attorney Certificate form completed by Mr. Zavareei has been forwarded to the Clerk of the Court. It is further certified that Mr. Zavareei has complied with the fee and e-mail registration requirements as required by Local Rule 2.01(d).

8. Hassan A. Zavareei, by and through designated counsel and pursuant to Rule 2.02 of the CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to [hzavareei@tzlegal.com](mailto:hzavareei@tzlegal.com).

9. Mr. Zavareei is associated with local counsel, Janet R. Varnell, of the law firm of Varnell & Warwick, P.A. Ms. Varnell is a resident of Florida and maintains an office in this District for the practice of law. She is a member in good standing of the Florida Bar and is an active member to the bar of this Court. She is the person with whom the Court and opposing counsel may readily communicate, upon whom all notices and papers may be served,

and who will be responsible for the progress of the case, including the trial in default of the non-resident attorney, Mr. Zavareei.

**Rule 3.01(g) Certification**

Counsel for Defendants have not entered an appearance and pursuant to Local Rule 3.01(g), the undersigned is unable to confer with opposing counsel to determine if they have any objection to the relief sought in this motion.

Dated: February 28, 2019

**VARNELL & WARWICK, P.A.**

By: /s/ Janet R. Varnell  
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Attorneys for Plaintiff

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on February 28, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Janet R. Varnell  
Janet R. Varnell

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**ORDER ON MOTION FOR ADMISSION TO APPEAR PRO HAC VICE**

THIS CAUSE came before the Court upon Janet R. Varnell's Motion under Local Rule 2.02 asking the Court to allow Hassan A. Zavareei for Admission to Appear Pro Hac Vice on behalf of Plaintiff in this case. Having considered the motion and all other papers submitted and the records and files herein, and having determined that all conditions to admission as counsel *pro hac vice* have been satisfied, it is

ORDERED AND ADJUDGED that the Motion for Admission for Hassan A. Zavareei to Appear *Pro Hac Vice* is GRANTED.

DONE AND ORDERED in Tampa, Florida, this \_\_\_\_ day of \_\_\_\_\_, 2019.

\_\_\_\_\_  
William F. Jung  
United States District Judge

Copies furnished to:  
*All counsel of record*